



COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

January 29, 2025

Via ECF
Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kahlon v. County of Nassau, et al.
Docket No. 24-CV-02439 (BMC)

Your Honor:

This office represents defendant County of Nassau (the "County") in the above-referenced matter. For the reasons set forth below, the County respectfully requests that the Court grant a short extension of time to enable the County to file its complete motion for summary judgment on ECF. Per the Court's order, the motion was to be served and filed on ECF by January 27, 2025. By 12:00 midnight of that evening, the motion was not fully complete. Yesterday, Tuesday, January 28, 2025 I was required to attend to three (3) separate medical appointments and thus was not in the office. In order to fully complete all moving papers, the County respectfully requests an extension of time until Friday, January 31, 2025 to serve and file on ECF the fully completed motion. The County consents to any extension of time for plaintiff Yossef Kahlon's attorneys to file opposing papers, subject to the Court's approval.

For the foregoing reasons, the County respectfully requests that the Court extend the time for the County to serve and file its motion for summary judgment to Friday, January 31, 2025. As always, the County thanks Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: (via ECF)
All counsel of record